



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

5 POST OFFICE SQUARE, SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

JAN - 8 2014

Mr. Antonio J. Matta
City Architect, City of Hartford
525 Main Street
Hartford, Connecticut 06103

Re: Modification to PCB Cleanup and Disposal Approval under 40 CFR
§§ 761.61 (a) and (c) and § 761.79(h)
Former Burgdorf Health Clinic and North End Senior Center
80 Coventry Street
Hartford, Connecticut

Dear Mr. Matta:

This is in response to the City of Hartford (the City) request to modify its PCB cleanup and disposal plan (the Notification) for the building located at 80 Coventry Street, Hartford, Connecticut. The modification was submitted in accordance with Condition 18 of the *March 23, 2013 PCB Cleanup and Disposal Approval under 40 CFR §§ 761.61(a) and (c) and § 761.79(h)*.

During construction work in mid-October, the City determined that additional building materials, including roof line window sashes and a free standing brick wall leading into the courtyard would be impacted by the renovations. Sampling of the caulk, building substrates, and soils identified PCBs at greater than (>) 1 part per million (ppm). The City is proposing to incorporate the newly identified PCB-contaminated caulk and associated roof line window sashes, the free standing brick wall leading to the courtyard, and the soils into its Notification for the Site.

The City is proposing the following modification to its Notification:

- Removal of the caulk and adjacent substrate (i.e., 4 inches of brick/mortar along the expansion joints) on the free standing brick wall to achieve a PCB cleanup standard of less than (<) 1 ppm; and,
- Removal and disposal of PCB-contaminated soils from the additional areas at the base of the brick wall expansion joints as a < 50 ppm *PCB remediation waste* in accordance with § 761.61(a)(5)(i)(B)(2)(ii).

The City has determined that the PCB caulk along the roof line which has a PCB concentration at < 50 ppm, meets the criteria for an *Excluded PCB Product* under § 761.3. Under the PCB regulations, *Excluded PCB Products* are authorized for use and thus there is no requirement for removal of the caulk or decontamination of surfaces that are in contact with the < 50 ppm PCB-contaminated building products. While the modification does not address these products, in its request the City has indicated that these products will be managed pursuant to the Connecticut Department of Energy and Environmental Protection (CTDEEP) regulations and requirements.

Based on review of the submitted information, EPA has determined that the proposed PCB caulk and brick/mortar removal on the free-standing brick wall and cleanup of the soils will meet the requirements of §§ 761.61(a) and § 761.79(h). Thus, EPA is approving your modification request with the following conditions:

- Following removal of the caulk and adjacent substrate (i.e., 4 inches of brick/mortar along the expansion joints), verification sampling of the *porous surfaces* (i.e., brick/mortar) shall be conducted at a frequency of 1 sample per 15 linear feet of *porous surfaces*; and,
- Unless otherwise modified by this letter, the City must comply with all of the terms and conditions specified in its May 23, 2013 Approval.

Should you have any questions regarding this matter, please contact Katherine Woodward at (617) 918-1353 or Kimberly Tisa at (617) 918-1527.

Sincerely,

A handwritten signature in black ink, appearing to read 'James T. Owens, III', with a stylized flourish at the end.

James T. Owens, III
Director, Office of Site Remediation and Restoration

Attachment 1

cc: Chris Liberti, Eagle Environmental
Gary Trombly, CTDEEP
File